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STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL
DIVISION OF AIR AND WASTE MANAGEMENT
715 GRANTHAM LANE
NEW CASTLE, DELAWARE 19720-4801

WASTE MANAGEMENT SECTION

TELEPHONE: (302) 323-4540

November 6, 1990

Robert J. Touhey, P.E.
Assistant Vice President
Environmental Affairs
Standard Chlorine of Delaware, Inc.
Governor Lea Road
P.O. Box 319
Delaware City, DE 19706

Subject: Red Lion Creek Fish Tissue Sampling of March.

Dear Mr. Touhey:

The purpose of this letter is to request clarification on the actions Standard Chlorine took regarding the fish sampling of March 1990. During our telephone conversation of 10/29/90, you stated that Standard Chlorine did not perform fish tissue analyses on the fish caught because the sampling was incomplete, and because the requirements of the Endangerment Assessment component of the FS would not be satisfied. In addition, you made reference to DNREC being agreeable to not having the analyses conducted.

As you know, I recently assumed responsibility for this site, and therefore was not a party to the discussions regarding the March 1990 fish sampling program. I have discussed this issue with Diane Wehner, the previous state project officer for this site, and she does not recollect ever agreeing to not have the fish analyses done by Standard Chlorine.

In addition, Diane submitted a letter to you on 3/15/90, which requested that the analyses be conducted. (See Attachment)

AR304290

Standard Chlorine
Page 2
November 6, 1990

In order to resolve this matter, I am requesting that you submit documentation which re-affirms your understanding of this issue.

Sincerely,



Karl Kalbacher
Hydrologist
Remedial-Superfund

KFK2027
KFK/ble

Attachment

pc: N.V. Raman
Stephen N. Williams
✓ Robert Guarni (3HW25)
Diane Wehner (NOAA)

AR304291



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March 15, 1990

Robert J. Touhey, P.E.
Assistant Vice President
Environmental Affairs
Standard Chlorine of Delaware, Inc.
Governor Lea Road
P.O. Box 319
Delaware City, DE 19706

Subject: Red Lion Creek Fish Tissue Sampling

Dear Mr. Touhey,

The purpose of this letter is to document the sampling activities conducted the week of March 5, 1990 by Roy F. Weston, Inc. on behalf of Standard Chlorine. This documentation is being provided by the State of Delaware at this time to avoid any confusion regarding decisions that had to be made in field as the sampling events commenced.

A total of five composite samples were collected from Red Lion Creek; two were collected from upstream and three were collected from downstream. The upstream samples were composites from a total of four fish each; the downstream samples were composites from a total of five fish each. Two filets were removed from each fish for split sampling purposes. In addition, the remainder of the fish was retained by Weston for whole body analysis. No splits of the whole body samples were collected by Versar, EPA's oversight contractor.

Carp was the only species of fish collected in great enough quantities to be analyzed. Though this species is not the most preferable of the bottom-feeders, a decision to move forward on analyzing the samples was made by the State due to the possibility that individuals fishing in Red Lion Creek may be eating the Carp. It may be possible to collect sunfish, a predator, in sufficient quantities for analysis in early Fall. I recommend you include this activity in the scope of your Endangerment Assessment Work Plan as the original RI/FS Work Plan did call for both a bottom feeder and a predator to be analyzed.

AR304292

Page 2
March 15, 1990

I hope this letter serves to clarify this issue. Please contact me directly at 323-4540 should you have any questions.

Sincerely,

Milton A. Beck for DEW

Diane E. Wehner
Environmental Scientist
Superfund - Remedial

DEW:ble
DEW2306

cc: N.V. Raman ✓
Robert Guarni, (3HW25)

AR304293